

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDS SDNY
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DOC #:
DATE FILED: AUG 05 2008

ROBERT MAKOWSKI,

X 08 Civ. 6150 (PAC)

Plaintiff,

-against-

STIPULATION (2)

UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 157 OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 NORTH OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 45 OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DOUGLASS J. MCCARRON, DENIS SHIEL, FRED KENNEDY, BILL HANLEY, MARTIN DEVEREAUX, GEORGE DILACIO, VIN TADDEO, SAL ANTONUCCI, NATIONAL ENVIRONMENTAL SAFETY COMPANY, INC., FELIX "DOE," JR. FELIX "DOE" SR., TOM "DOE", NOEL "DOE," "JOHN DOE 1-8," "JOHN DOE INC. 9-15", AND METROPOLITAN ARCHITECTURAL WOODWORK, LLC.

Defendants.

X

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for parties hereto that the time of defendants DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 157 OF THE DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF

AMERICA, LOCAL 608 OF THE DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 NORTH OF DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 45 OF THE DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DENIS SHEEL, MARTIN DEVEREAUX, VIN TADDEO and SAL ANTONUCCI to answer or move with respect to the complaint is extended to and including August 29, 2008.

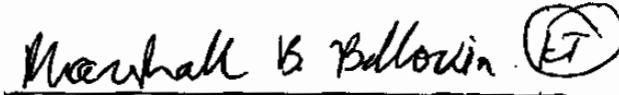
IT IS FURTHER STIPULATED AND AGREED, that the foregoing defendants waive defenses relating to service of process and personal jurisdiction.

Dated: New York, New York
July 31, 2008

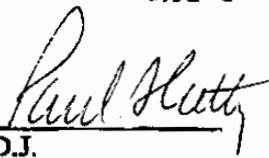
O'DWYER & BERNSTIEN, LLP
Attorneys for Defendants District Council, Local 457, Local 608, Local 608N, Local 45, Sheel, Devereaux, Taddeo and Antonucci


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SO ORDERED: AUG 05 2008


Paul Hickey
U.S.D.J.

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 * ALSO ADMITTED IN NJ
 ** ALSO ADMITTED IN CT
 ^ ALSO ADMITTED IN PA & NJ
 "J.D. NOT ADMITTED

WRITER'S DIRECT DIAL

August 4, 2008

By Hand

Honorable Paul A. Crotty
 United States District Judge
 United States District Court
 500 Pearl Street
 New York, New York 10007

Re: Makowski v. United Brotherhood of Carpenters, et al.
08 Civ. 6150 (PAC)

Dear Hon. Crotty:

This firm represents defendants District Council of Carpenters, Local 157, Local 608, Local 608 N, Local 45, Denis Sheil, Martin Devereaux, Vin Taddeo and Sal Antonucci. We write with respect to an extension of time to respond to the complaint. Plaintiff's counsel, Marshall B. Bellovin, Esq. has consented to this extension.

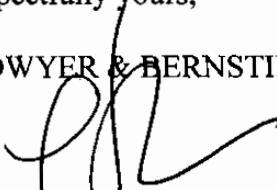
The Defendants represented by this firm were served at different times, and thus their answers are due at various times. According to the Clerk's office (and as reflected on Pacer) the answers of defendants Antonucci and Local 45 are due August 4, 2008, the answer for defendant Local 608 N is due August 6, 2008, and the answers for defendants District Council, Local 157, Local 608, Denis Sheil, Martin Devereaux, Vin Taddeo and Sal Antonucci are due August 11, 2008.

Counsel have entered into a stipulation providing the time for the above defendants to answer or move is extended to and including August 29, 2008. This is the first request for extension of time.

We respectfully request that the Court "So Order" the enclosed Stipulation. Thank you for consideration of this request.

Respectfully yours,

O'DWYER & BERNSTIEN, LLP


 GARY SILVERMAN (GS9287)

cc: Marshall B. Bellovin, Esq.
 enc.